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2 A Limited Liability Partnership  
3 Including Professional Corporations  
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11 Attorneys for Defendant.  
12 CHEVRON U.S.A. INC.,  
13 a Pennsylvania corporation

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

MARK SNOOKAL, an individual,

Plaintiff,

vs.

CHEVRON USA, INC., a California Corporation, and DOES 1 through 10, inclusive,

Defendants.

Case No. 2:23-cv-6302-HDV-AJR

**DECLARATION OF ROBERT E. MUSSIG IN SUPPORT OF DEFENDANT CHEVRON U.S.A., INC.’S OPPOSITION TO PLAINTIFF MARK SNOOKAL’S MOTION IN LIMINE NO. 1 – DAUBERT MOTION TO EXCLUDE THE EXPERT OPINION TESTIMONY OF DR. VICTOR ADEYEYE**

Date: July 24, 2025

Time: 10:00 a.m.

Place: Courtroom 5B – Fifth Floor

District Judge: Hon. Hernán De. Vera  
Magistrate Judge: Hon. A. Joel Richlin

Action Filed: August 3, 2023

Trial Date: August 19, 2025

## **DECLARATION OF ROBERT MUSSIG**

I, Robert Mussig, declare as follows:

1. I am an attorney licensed to practice law in California. I am a partner with the law firm Sheppard, Mullin, Richter & Hampton LLP, counsel of record for Defendant Chevron U.S.A. Inc., a Pennsylvania corporation. I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. Dr. Victor Adeyeye was deposed in this matter on November 15, 2024 and April 22, 2025, and I am in possession of certified copies of the deposition transcripts. Attached hereto as **Exhibit A** is a true and correct copy of relevant excerpts from volume one of Dr. Adeyeye's deposition transcript.

3. Dr. Ujomoti Akintunde was deposed in this matter on October 31, 2024, and I am in possession of a certified copy of the deposition transcript. Attached hereto as **Exhibit B** is a true and correct copy of relevant excerpts from Dr. Akintunde's deposition transcript.

4. My office took the deposition of Plaintiff's Rebuttal Expert, Dr. Alexander R. Marmureanu on January 29, 2025, and I am in possession of a certified copy of the deposition transcript. Attached hereto as **Exhibit C** is a true and correct copy of relevant excerpts from Dr. Marmureanu's deposition transcript.

5. A true and correct copy of the cover page of the Medical Examination Program, which was produced by Chevron U.S.A. in discovery at Bates nos. CUSA000837-944, is attached here as **Exhibit D**. This document is over 100 pages long and, for the sake of judicial economy, is not attached in its entirety.

1 I declare under penalty of perjury under the laws of the State of California that the  
2 foregoing is true and correct, and that this Declaration was executed on July 15, 2025, at  
3 Los Angeles, California.

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6 */s/ Robert Mussig*  
7 ROBERT MUSSIG  
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